

PETER S. CHRISTIANSEN, ESQ.  
Nevada Bar No. 5254  
pete@christiansenlaw.com  
KENDELEE L. WORKS, ESQ.  
Nevada Bar No. 9611  
kworks@christiansenlaw.com  
KEELY A. PERDUE, ESQ.  
Nevada Bar No. 13931  
keely@christiansenlaw.com  
CHRISTIANSEN TRIAL LAWYERS  
710 S. 7<sup>th</sup> Street, Suite B  
Las Vegas, Nevada 89101  
Telephone: (702) 240-7979  
Facsimile: (866) 412-6992

*Attorneys for Defendant Cristiano Ronaldo*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KATHRYN MAYORGA,

Plaintiff,

v.

CRISTIANO RONALDO,

Defendant.

CASE NO.: 2:19-cv-00168-JAD-DJA

**DEFENDANT'S LIMITED  
OPPOSITION TO PLAINTIFF'S  
MOTION TO EXTEND TIME TO  
REPLY TO DEFENDANT'S  
RESPONSE TO PLAINTIFF'S  
MOTION FOR *IN CAMERA* REVIEW  
OF THE FOOTBALL LEAKS  
DOCUMENTS TO DETERMINE  
WHETHER THE CRIME/FRAUD  
EXCEPTION APPLIES [ECF NO. 124]**

Defendant Cristiano Ronaldo hereby submits his Limited Opposition to Plaintiff's Motion to Extend Time to Reply to Defendant's Response to Plaintiff's Motion for In Camera Review of the Football Leaks Documents to Determine Whether the Crime Fraud Exception Applies [ECF No 24]. Defendant once again must file a limited opposition to yet another request by Plaintiff for an extension of a deadline in order to correct the record. By way of stipulation filed and approved by this Court on July 28, 2021 [ECF No. 128], the Parties agreed to afford Plaintiff one additional week in which to file her Reply as to the subject motion, for a total of 14 days from the filing of Defendant's Opposition. On August 19, Plaintiff's counsel emailed the Defense asking that the August 25, 2021 reply deadline be extended to September 9, 2021. *See* Email





1 Correspondence attached hereto as **Exhibit A**. Plaintiff's counsel's email provided no reason for  
 2 the requested extension. *Id.* Defendant's counsel responded with an email attaching the prior  
 3 stipulation and order [ECF No. 128], which had already extended the Reply deadline from August  
 4 25, 2021 to September 1, 2021 – a date Plaintiff's counsel personally selected. Contrary to  
 5 Plaintiff's assertion that email was blank, it explained in the body of the email that there had  
 6 already been a stipulation to extend and attached the document for reference. *See* August 19,  
 7 2021 email attached hereto as **Exhibit B**. Plaintiff's counsel's assistant then responded stating  
 8 simply that Mr. Stovall would require additional time beyond September 1, 2021, but again  
 9 offered no explanation as to the basis for the need. *See* August 20, 2021 Email attached hereto as  
 10 **Exhibit C**.

11 As the Court will recall, Plaintiff's Oppositions to the related motions filed by Defendant  
 12 were not filed until August 20, 2021 - more than 7 weeks from the initial filings on May 27, 2021.  
 13 *See* ECF Nos. 111, 113, 123 and 125, respectively. Indeed, the only brief Plaintiff has timely filed  
 14 in this case without need for an extension was the reply in support of her motion for extension of  
 15 time to file the aforementioned oppositions [ECF No. 122]. While the Defense certainly  
 16 recognizes the challenges of managing a busy trial practice and family life, Plaintiff's requests  
 17 for extensions of time in this case are near limitless and often made with little to no explanation  
 18 justifying such requests. In this particular instance, Plaintiff's counsel provided absolutely no  
 19 explanation for his need for an additional week beyond the seven-day extension he had already  
 20 been afforded. Plaintiff's counsel still offers no explanation for selecting September 1, 2021 as  
 21 the deadline for the instant Reply but then apparently leaving the country despite that the deadline  
 22 had been set since July 28, 2021.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Discovery in this case remains stayed pending the outcome of the instant motion, which  
2 arises out of Defendant's motion and request that this Court enter case terminating sanctions.  
3 ECF No. 130. Accordingly, like the many others that preceded it, this most recent request only  
4 further delays justice and unnecessarily extends the proceedings in this case. As such, Defendant  
5 requests that Plaintiff be required to file her Reply in support of the subject motion no later than  
6 Friday, September 3, 2021.

7 Dated this 1st day of September, 2021.

8 CHRISTIANSEN TRIAL LAWYERS

9 By

10  PETER S. CHRISTIANSEN, ESQ.

11 KENDELEE L. WORKS, ESQ.

12 KEELY A. PERDUE, ESQ.

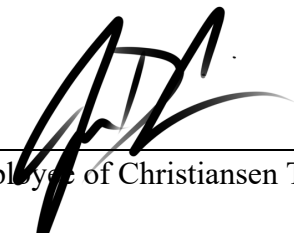
13 *Attorneys for Defendant Cristiano Ronaldo*

CHRISTIANSEN  
— TRIAL LAWYERS —



**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5 and LR-5.1, I certify that I am an employee of CHRISTIANSEN TRIAL LAWYERS, and that on this 1<sup>st</sup> day of September, 2021, I caused the foregoing document entitled **DEFENDANT'S LIMITED OPPOSITION TO PLAINTIFF'S MOTION TO EXTEND TIME TO REPLY TO DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR *IN CAMERA* REVIEW OF THE FOOTBALL LEAKS DOCUMENTS TO DETERMINE WHETHER THE CRIME/FRAUD EXCEPTION APPLIES [ECF NO. 124]** to be filed and served via the Court's CM/ECF electronic filing system upon all registered parties and their counsel.

  
\_\_\_\_\_  
An employee of Christiansen Trial Lawyers

CHRISTIANSEN  
— TRIAL LAWYERS —



# Exhibit “A”

# Exhibit “A”

MH

From: **Maria Hernandez** [maria@lesstovall.com](mailto:maria@lesstovall.com)  
Subject: RE: Mayorga v. Ronaldo - Deposition of Michaela Tramel  
Date: August 19, 2021 at 2:56 PM  
To: Kendelea Works [kworks@christiansenlaw.com](mailto:kworks@christiansenlaw.com), Peter S. Christiansen [pete@christiansenlaw.com](mailto:pete@christiansenlaw.com)  
Cc: Jonathan Crain [jcrain@christiansenlaw.com](mailto:jcrain@christiansenlaw.com), Ross Moynihan [ross@lesstovall.com](mailto:ross@lesstovall.com), Esther Barrios Sandoval [esther@christiansenlaw.com](mailto:esther@christiansenlaw.com), Les Stovall [les@lesstovall.com](mailto:les@lesstovall.com), Keely Perdue [keely@christiansenlaw.com](mailto:keely@christiansenlaw.com)

Good Afternoon,

Mr. Stovall would like to know if you are willing to sign a stipulation to extend the time for plaintiff's to file her reply currently due on August 25, 2021 be continued to September 9, 2021. Mr. Stovall is scheduled out of jurisdiction until September 1, 2021. Please advise.

Thank you

**Maria Hernandez**




[maria@lesstovall.com](mailto:maria@lesstovall.com)  
[www.lesstovall.com](http://www.lesstovall.com)  
**Stovall & Associates**  
2301 Palomino Lane  
Las Vegas, NV 89107  
P: (702) 258-3034  
F: (702) 258-0093

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND/OR EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED

**From:** Keely Perdue <[keely@christiansenlaw.com](mailto:keely@christiansenlaw.com)>  
**Sent:** Thursday, July 29, 2021 4:58 PM  
**To:** Maria Hernandez <[maria@lesstovall.com](mailto:maria@lesstovall.com)>  
**Cc:** Kendelea Works <[kworks@christiansenlaw.com](mailto:kworks@christiansenlaw.com)>; Peter S. Christiansen <[pete@christiansenlaw.com](mailto:pete@christiansenlaw.com)>; Jonathan Crain <[jcrain@christiansenlaw.com](mailto:jcrain@christiansenlaw.com)>; Ross Moynihan <[ross@lesstovall.com](mailto:ross@lesstovall.com)>; Esther Barrios Sandoval <[esther@christiansenlaw.com](mailto:esther@christiansenlaw.com)>; Les Stovall <[les@lesstovall.com](mailto:les@lesstovall.com)>  
**Subject:** Re: Mayorga v. Ronaldo - Deposition of Michaela Tramel

# Exhibit “B”

# Exhibit “B”

From: **Kendelea Works** kworks@christiansenlaw.com   
Subject: 20210728 Order Granting SAO to Ext Deadlines.pdf  
Date: August 19, 2021 at 3:43 PM



To: **Maria Hernandez** maria@lesstovall.com, **Les Stovall** les@lesstovall.com, **Ross Moynihan** ross@lesstovall.com  
Cc: **Peter S. Christiansen** pete@christiansenlaw.com, **Jonathan Crain** jcrain@christiansenlaw.com, **Whitney Barrett** wbarrett@christiansenlaw.com



20210728 Order  
Grantin...es.pdf

Hi Maria,

Per the last stipulation, we agreed to one additional week on the reply brief, making it due 9/1. I've attached a copy for your reference.

Thanks,  
Kendelea



# Exhibit “C”

# Exhibit “C”



From: **Maria Hernandez** [maria@lestovall.com](mailto:maria@lestovall.com)  
Subject: RE: 20210728 Order Granting SAO to Ext Deadlines.pdf  
Date: August 20, 2021 at 1:06 PM  
To: Kendelea Works [kworks@christiansenlaw.com](mailto:kworks@christiansenlaw.com)  
Cc: Peter S. Christiansen [pete@christiansenlaw.com](mailto:pete@christiansenlaw.com), Jonathan Crain [jcrain@christiansenlaw.com](mailto:jcrain@christiansenlaw.com), Whitney Barrett [wbarrett@christiansenlaw.com](mailto:wbarrett@christiansenlaw.com), Les Stovall [les@lestovall.com](mailto:les@lestovall.com), Ross Moynihan [ross@lestovall.com](mailto:ross@lestovall.com)

Good Morning Kedelee,

Mr. Stovall needs additional time from September 1, 2021. Mr. Stovall would like to know if you are willing to sign a stipulation to extend the time from September 1 to September 9, 2021. Please advise.

Thank you

**Maria Hernandez**



[maria@lestovall.com](mailto:maria@lestovall.com)  
[www.lestovall.com](http://www.lestovall.com)

**Stovall & Associates**

2301 Palomino Lane  
Las Vegas, NV 89107  
P: (702) 258-3034  
F: (702) 258-0093

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND/OR EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED

**From:** Kendelea Works <[kworks@christiansenlaw.com](mailto:kworks@christiansenlaw.com)>  
**Sent:** Thursday, August 19, 2021 3:44 PM  
**To:** Maria Hernandez <[maria@lestovall.com](mailto:maria@lestovall.com)>; Les Stovall <[les@lestovall.com](mailto:les@lestovall.com)>; Ross Moynihan <[ross@lestovall.com](mailto:ross@lestovall.com)>  
**Cc:** Peter S. Christiansen <[pete@christiansenlaw.com](mailto:pete@christiansenlaw.com)>; Jonathan Crain <[jcrain@christiansenlaw.com](mailto:jcrain@christiansenlaw.com)>; Whitney Barrett <[wbarrett@christiansenlaw.com](mailto:wbarrett@christiansenlaw.com)>  
**Subject:** 20210728 Order Granting SAO to Ext Deadlines.pdf